

To: Clerk of Court - SDNY

500 Pearl Street

New York, NY 10007

From: Brandon Green Reg. No. 56400-054

Re: Case No. 16 Cr. 281--002 (PGG)

Date: January 22, 2021

COVER LETTER FOR CLIENT FILE REQUEST

To the Honorable Clerk of This Court:

Sent herewith this Cover Letter is a document title: REQUEST FOR CLIENT FILE; AND NOTICE OF INTENT TO SUE. Please can you file this and upload it to my Docket.

Thank you for your time and have a wonderful day.

Best Regards,

_____/S/_____

Brandon Green Reg. # 56400-054

Defendant, Pro Se

To: Attorneys Eric R. Breslin & Melissa S. Geller

From: Brandon Green Reg. No. 56400-054

Defendant, Pro Se

cc: Clerk of Court, U.S. Dist. Court - SDNY;

AUSA Jessica Feinstein

Re: Case No. 16 Cr. 281--002 (PGG)

Date: January 22, 2021

REQUEST FOR CLIENT FILE; AND NOTICE OF INTENT TO SUE

Dear Mr. Breslin & Ms. Geller:

Thank you both for your time. Since the both of you were relieved from this case, a lot has happened; and, it appears that there is still information that I need from you so that I can proceed: That is why I'm writing this letter. I want to discuss with you herein what it is I need from you and why. Moreover, I hope that you can help me to obtain this information, however, if not, then this letter serves as Notice of my Intent to file a lawsuit and similar related complaints with, inter alias, the American Bar Association (ABA), against the both of you, and the law firm of Duane Morris. I hope that it does not have to come to this.

What I need from you is my client file. Apparently, the one you sent Ms. Dolan back around November of 2019 did not work, and/or did not contain any readable data. See Letter from Ms. Dolan to Attorney Steven Witzel, dated: December 14, 2020 (stating: "Please find enclosed my case file in Brandon Green's case... .Also included is a flash drive from predecessor counsel, Eric R. Breslin and Melissa S. Geller, which I understand was supposed to contain their client file; however, as I mentioned when we spoke on the phone, the device appears to be corrupted or no longer holds any data"); and see, Letter From Mr. Witzel to e, dated: January 8, 2021 (stating: "The only item that we received from Ms. Dolan that is not included in this package is a USB flash drive. As we have discussed, the flash drive contained no readable data"). Consequently, I am still without this information, and this is a problem.

The District Court recently issued an Order stating that I had until February 9, 2021, to submit an Attorney-Client Privilege Waiver Form, and an Affidavit listing the facts supporting my claims of, among other things, ineffective assistance of counsel (IAC), and prosecutorial misconduct. However, in order to

perfect my Affidavit of Facts and the accompanying petition that I will be filing, I need to first review my client file from you.

Therefore, I'm respectfully reaching out to the both of you to formally request that you provide me with my client file, or a definitive answer in writing that you will not be doing this, within 5 days of the receipt of this letter. Please take Notice that if you decide to inform me that you will not be providing me this information, and/or if you fail to provide it within the allotted time frame, then I will be proceeding with filing appropriate complaints with the Court(s) and other agencies and organizations (like the ABA). I hate to do this, but I feel that I have no other choice in this matter.

I look forward to hearing back from either or the both of you soon. If there are any questions, comments, or concerns, please feel free to let me know immediately by reaching out to me. Thank you again.

Respectfully Submitted,

_____/S/_____

Brandon Green Reg. # 56400-054

Defendant, Pro Se

Brandon Green 6040054
MDC Brooklyn
P.O. Box 329002
Brooklyn NY 11232

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Jim Dlt JR

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